

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

CHRISTINE CONFORTI, *et al.*,

Plaintiffs,

v.

**CHRISTINE GIORDANO HANLON, in
her official capacity as Monmouth County
Clerk, *et al.*,**

Defendants.

Case No. 3:20-CV-08267-ZNQ-TJB

Civil Action

**PROPOSED COURT ORDER
APPROVING SETTLEMENT AND
DISMISSAL AS TO INTERVENOR
MIDDLESEX COUNTY
DEMOCRATIC ORGANIZATION**

Pursuant to Fed. R. Civ. P. 41(a)(2), Intervenor-Defendant Middlesex County Democratic Organization ("MCDO") and Plaintiffs, agree as follows:


1. MCDO will no longer contest Plaintiffs' claims in this litigation.
2. MCDO will not intervene in any other litigation in federal or state court contesting the constitutionality of New Jersey's current ballot design statutes as addressed in the Opinion (ECF No. 194) and Order (ECF No. 195) issued by this Court in *Kim v. Hanlon*, Civ. A. No. 24-cv-1098.
3. The Plaintiffs will not pursue attorneys' fees and costs against the MCDO, although Plaintiffs reserve the right to do, and intend to do so, as against all remaining parties in the action, including pursuant to joint and several liability.

Based on the foregoing, it is stipulated and agreed between Plaintiffs and the MCDO, and subject to the Court's approval below, that the MCDO's claims and defenses in this matter, including their answer and defenses (DE172) are dismissed with prejudice and without costs with regard to the MCDO.


For Plaintiffs:



WEISSMAN & MINTZ
By: Flavio L. Komuves



By: Brett M. Pugach



BROMBERG LAW LLC
By: Yael Bromberg

For MCDO:



McMANIMON, SCOTLAND & BAUMANN, LLC
By: William W. Northgrave

The Court has reviewed and approves the foregoing stipulation. **ORDERS** the parties hereto to comply with its terms, and retains jurisdiction to enforce its terms. It is so **ORDERED**.
this _____ day of _____, 2024.

The Honorable Zahid N. Quraishi, U.S.D.J.